

# Privacy Policy for Career Sites

Updated: 28 May 2019

## 1 Introduction

- 1.1 This Privacy Policy ("**Policy**") is used by VONQ UK Ltd. ("**VONQ**", "**we**", "**us**", "**our**"), a company with limited liability under the laws of the England, having its registered office in London, England, and its statutory seat at Burwood Place 1, (W2 2UT) London, England and registered at the Chamber of Commerce under registration number 6209834. VONQ can be reached by emailing us at [hello@vong.com](mailto:hello@vong.com).
- 1.2 VONQ values the rights that have been admitted to natural persons within especially the General Data Protection Regulation ("**GDPR**"), German Federal Data Protection Act ("**BDSG**") and German Telemedia Act ("**TMG**"), the Privacy and Electronic Communications Regulations ("**PECR**"), and the Dutch Data Protection Act ("**DDPA**"), and therefore would like to inform you about the processing of data by VONQ. The Policy applies to all processing of data that identifies you or may be used by VONQ to identify you with ("**Personal Data**") as performed in the course of your activities on the job application page on has-jobs.co.uk or has-jobs.com ("**Website**").
- 1.3 When visiting the Website, two types of Personal Data are processed by VONQ:
  - 1.3.1 Personal Data relating to you as a visitor of the Website for which we have determined the purpose and means of processing and for which we are the 'data controller' pursuant to the GDPR ("**VONQ Personal Data**");
  - 1.3.2 Personal Data that is collected by VONQ on behalf of and per instruction of a company or organisation which we have entered into an agreement with who is the 'data controller', which Personal Data is transferred to such company organisation as part of our services for that company or organisation ("**Candidate Personal Data**").
- 1.4 We may amend the Policy at any time. In case the Policy is amended, this amended Policy will be made available to you through the Website.

## 2 Processing of VONQ Personal Data

- 2.1 VONQ is processing your Personal Data because you are visiting the Website. If you visit our Website for purely informational purposes we will only process those of your Personal Data which are automatically transmitted to us by your Internet browser ("**Log Data**"): IP address; Browser type and browser version; Used operating system; Referrer URL; Hostname of the accessing device; Date and time of the request; amount of data sent. VONQ uses the Log Data only for statistical evaluations for the purpose of operation, security and optimisation of the Website. These Log Data cannot be assigned to specific persons and will not be merged with other data sources. VONQ reserves the right to subsequently check this Log Data if concrete indications of illegal use become known.
- 2.2 On the Website, you may perform activities such as but not limited to filling out application forms. Where you provide Personal Data as a potential employee in the course of those activities, we will process such Personal Data as well.
- 2.3 While VONQ may build a profile in relation to you by arranging the available information, VONQ does not perform any automated decision making based on this profile, including profiling as referred to in article 22 (1) and (4) GDPR. Pseudonymous usage profiles may be created for advertising, market research, and site design purposes that do not allow immediate inference to the underlying natural person.

- 2.4 Apart from the above, we collect and process Personal Data such as your IP address, as collected via cookies and similar techniques (please be referred to article 6) automatically as VONQ Personal Data. This is not mandatory and not necessary to enter into an agreement with us. Should you choose not to provide this information, we may not be able to offer you the Website as intended.
- 2.5 VONQ anonymises part of the Personal Data, which means we transform the Personal Data into data that can no longer be attributed to a natural person. We call this data 'Non-Personal Data'. VONQ hereby reserves the right to store Non-Personal Data for as long as we find to be necessary.

### **3 Processing of Candidate Personal Data**

- 3.1 Should you choose to apply for a job via the Website with which VONQ has entered into a contract with, VONQ will process your Personal Data as well. Please note however that VONQ is not the data controller for this Personal Data, but the company at which you are applying for a job is. In the course of such, the following Personal Data may be collected and processed by VONQ on behalf of such party:
- 3.1.1 Your IP address;
  - 3.1.2 Your name;
  - 3.1.3 Your address;
  - 3.1.4 Your telephone number;
  - 3.1.5 Your email address;
  - 3.1.6 Your CV document;
  - 3.1.7 Your cover letter;
  - 3.1.8 Your level of education;
  - 3.1.9 Your years of experience in a similar position;
  - 3.1.10 Additional attachments you upload for the purpose of applying (for instance a letter of recommendation);
  - 3.1.11 Any additional information you provide through the application form.
- 3.2 The above-stated data is mandatory and necessary to apply on the Website. We kindly refer you to their Privacy Policy as well, to be found on the Website.

### **4 Purposes of processing Personal Data and the legal basis thereof**

- 4.1 Personal Data is collected and processed by VONQ for the following purposes:
- 4.1.1 Providing the Website to you;
  - 4.1.2 Analysing the effectiveness of the Website;
  - 4.1.3 Allowing you to contact VONQ and allowing VONQ to respond to your request;
  - 4.1.4 Analysing the use of the Website;
  - 4.1.5 Analysing Personal Data to improve the Website;
  - 4.1.6 Promoting the use of VONQ Services;
  - 4.1.7 Improving the Website;
  - 4.1.8 Providing a landing page for online job vacancy postings, pursuant to a contract VONQ has entered into with a third party;
  - 4.1.9 Transferring Personal Data to a third party, pursuant to a contract VONQ has entered into with a third party and pursuant to your initiative to respond to a job vacancy;
  - 4.1.10 Allowing you to apply for a job at a company VONQ or one of its affiliated companies has entered into an agreement with;
  - 4.1.11 Analysing the effectiveness of the job postings pursuant to the performance of services by VONQ on behalf of third parties.
- 4.2 VONQ processes the VONQ Personal Data on the following legal basis:

- 4.2.1 You have given consent to the processing of your personal data for one or more specific purposes;
- 4.2.2 The processing is necessary for the performance of a contract of which you are party to or in order to take steps at the request of you prior to entering into a contract such as submitting your application;
- 4.2.3 The processing is necessary for the purposes of the legitimate interests pursued by the company you are applying for a job to, where such legitimate interest comprises the interest to perform the agreement with the company you are applying to and, in addition, the legitimate interest of VONQ comprises the interest to perform the requested services and conduct the business model of VONQ in the most optimal way.

## **5 Retention times**

- 5.1 We store your Personal Data as long as necessary to perform the purposes of processing as stated in this Policy. In addition, the following specific retention times apply.
- 5.2 When you are a visitor of the Website, we will store VONQ Personal Data for four weeks after the job description has been taken off the Website, unless any applicable laws or legislations require longer storage.
- 5.3 Should you choose to apply to a job via the Website, we will store your Candidate Personal Data as long as necessary to perform our obligations towards the party you are applying for a job at. This obligation constitutes of transferring the Candidate Personal Data to such party and possibly any further services of VONQ such as organising or managing data. Please bear in mind that the company you are applying for a job at is the data controller for the Candidate Personal Data necessary for your application and their privacy policy applies to further processing of your Candidate Personal Data.

## **6 Recipients of Personal Data**

- 6.1 All Candidate Personal Data shall be shared with the company you are applying to for a job.
- 6.2 When such is necessary to perform our Services to you and the company you are applying to, we may transfer Personal Data to our processors. Processors shall always act and process Personal Data on behalf of VONQ and the instructions we provide them with. These may include:
  - 6.2.1 Mailgun for sending emails (US based company, part of EU-US [Privacy Shield](#));
  - 6.2.2 Amazon for storing attachments (EU based);
  - 6.2.3 Prolocation Server hosting provider (Dutch company);
  - 6.2.4 Filestack to upload files (US based company, part of EU-US [Privacy Shield](#));
  - 6.2.5 Intercom to communicate with users (US based company, part of EU-US [Privacy Shield](#)).
- 6.3 When such is necessary to perform the Services, we will provide the Personal Data to affiliated companies of VONQ. These companies are:
  - 6.3.1 VONQ GmbH, Georg-Glock-Straße 8, 40474 Düsseldorf, Germany.
  - 6.3.2 VONQ UK Ltd., 1 Burwood Place, London W2 2UT, United Kingdom.

## **7 Cookies and Google Analytics**

- 7.1 As stated above, VONQ collects Personal Data automatically via cookies and similar techniques. These are small data files placed and stored on your internet browser on your computer to serve as an identifier, to navigate through the Website, and to enable certain features of the Website. These do not damage your computer and contain no harmful software.

7.2 Our Cookie Policy may be read at: <https://www.vong.com/candidate-dataprivacy/>

## 8 Security

8.1 VONQ ensures that it has taken all measures as stated in article 32 GDPR, meaning that, considering the state of the art, the costs of implementation and the nature, scope, context and purposes of Processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, VONQ has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including, among others, as appropriate:

8.1.1 The pseudonymization and encryption of personal data;

8.1.2 The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;

8.1.3 The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

8.1.4 A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

8.2 Should any Personal Data breach occur and result in a high risk to your rights and freedoms, we will communicate this to you without undue delay.

## 9 Your rights

9.1 The GDPR provides you with, depending on the situation, the following rights:

9.1.1 The right to access Personal Data;

9.1.2 The right to rectification of Personal Data;

9.1.3 The right to request from VONQ the erasure of Personal Data;

9.1.4 The right to request VONQ whether the processing of the Personal Data may be restricted;

9.1.5 The right to object to processing;

9.1.6 The right to data portability;

9.1.7 Where the processing is based on consent: the right to withdraw such consent at any time, without such withdrawal having an effect on the legitimacy of the processing prior to withdrawal;

9.1.8 The right to lodge a complaint at a supervisory authority.

9.2 When performing these rights, VONQ may request specific additional information. Such additional information will only be processed for the purpose of performing the rights mentioned.

## 10 Children rights

10.1 The Website does not address anyone under the age of 16 ("**Children**").

10.2 We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

## 11 Questions

11.1 Should you have any questions after reading the Policy, or would like to exercise any right as stated in the Policy, please do not hesitate to contact us with the details provided to you in the Policy or email us and our data protection officer at [legal@vong.com](mailto:legal@vong.com).